REMARKS

Claims 2, 5-21, 24-34 and 37-55 are pending in the application.

Claims 2, 5-21, 24-34 and 37-55 have been rejected.

Claims 2, 11, 13, 15, 18-19, 21, 30, 32, 34, 38-43, 45-46, 49, 52-53 and 55 have been amended.

Claims 10, 12, 17, 20, 29, 31, 44, 48, and 51 have been cancelled in the present amendment without prejudice to the subject matter recited therein; whereas, claims 1, 3-4, 22-23, and 35-36 had been previously cancelled.

Claims 56-60 have been added to define additional protectable subject matter.

After all claim amendments, cancellations, and additions, claims 2, 5-9, 11, 13-16, 18-19, 21, 24-28, 30, 32-34, 37-43, 45-47, 49-50, and 52-60 now remain pending in the application.

Rejection of Claims Under 35 U.S.C. §102

Claims 2, 5-21, 24-34 and 37-55 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,704,409 issued to Dilip et al. ("Dilip"). The anticipation rejection of claims 10, 12, 17, 20, 29, 31, 44, 48, and 51 is moot in view of the present cancellation thereof. Applicants respectfully traverse the anticipation rejection of the remaining claims 2, 5-9, 11, 13-16, 18-19, 21, 24-28, 30, 32-34, 37-43, 45-47, 49-50, and 52-55 in view of the following remarks and present claim amendments.

Dilip teaches a transaction control system that is capable of receiving both real-time transaction and non-real-time transactions such as telephone calls, electronic mail, voice mail,

facsimile, etc. (Dilip, Abstract, and Col. 4, lines 35-41.) The control system processes the received transactions using a transaction controller. Real-time transactions may be assigned a higher priority than non-real-time transactions. The control system may queue a received transaction if no agent is available to process the received transaction. (Dilip, Abstract.) Generally, a transaction can be either inbound (received by the transaction processing or control system) or outbound (transmitted from the transaction processing system). (Dilip, Col. 4, lines 4-6.) There may be a single or separate servers for each type of transaction supported by the transaction processing system. (Dilip, Fig. 2, Col. 5, lines 48-52, and Col. 7, lines 1-6.)

At col. 3, lines 25-47, Dilip teaches that an agent can handle multiple types of transactions through a centralized control system. When an agent is available, the highest priority transaction, of any type, is provided to the agent. This reduces the possibility that an agent will be idle for a significant period of time and the supervisors are not required to manually switch agents from handling one type of transaction to another, because the transaction controller handles transaction selection automatically. Furthermore, as explained at col. 13, lines 45-54 in Dilip, an agent's system is automatically prepared to handle the next transaction, without requiring the agent to manually log out of one system and log into another.

The amended independent claim 2 recites an apparatus that comprises, *inter alia*, "a configurable communication server configured to communicate, in a media-independent manner, via a media-specific communication channel using a corresponding channel driver associated with said communication channel, wherein the communication server is configured to communicate independently of a media type of the communication channel, and wherein said channel driver is configured according to an interface that facilitates communication between the communication server and the channel driver in said media-independent manner...and *a web*

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browser-based media-independent user interface …configured to provide a notification of the event received from the communication channel." (Emphases supplied.)

The present amendments to claim 2 find support throughout the specification of the instant application. For example, Fig. 1A illustrates a client/server system 100 for enabling agents to respond to customer support requests and/or information requests via multiple communication channels of different media types. (Page-6, lines 3-10.) A discussion of web browser-based user interface (e.g., the toolbar 105 in Fig. 1A) is provided on page 7, lines 6-17 in the specification. Fig. 6 illustrates an exemplary media-independent implementation (e.g., the media indicator icon 602) of the toolbar 105 in Fig. 1A. As discussed, for example, at pages 8-10 in the instant specification, the communication server 109 according to one embodiment of the present invention is not media-specific even though communications channels 130 may be media-specific. Additional discussion of interactions and operations of various system elements including, for example, the communication server 109, various communication channels 130, channel drivers 120, communication API (application program interface) 125, etc., is provided throughout the specification of the instant application.

From the foregoing discussion and the associations made in the Office Action between the disclosure of Dilip and the claimed elements (e.g., Dilip's transaction processing system 40 to the claimed communication channel and Dilip's transaction controller 44 to the claimed communication server) (*see* Office Action, pp.2-4), Applicants assert that Dilip fails to teach an apparatus as recited in the amended independent claim 2, wherein communication is carried out in a media-independent manner via a media-specific communication channel using a corresponding channel driver and wherein a web browser-based media-independent user interface is provided. Applicants fail to find a teaching in Dilip of all recited claim limitations in

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the combination of the amended independent claim 2. For example, there is no teaching in Dilip

that the disclosed transaction processing system 40 is media specific, and, in fact, Dilip teaches

just the opposite. *See* Dilip, Fig.2; *see also* Dilip, Col.6, lines 7-28.

Therefore, Applicants assert that Dilip fails to anticipate the amended independent claim

as well as its pending dependent claims 5-9, 11, 13-14, and 54-55. Other pending independent

claims 15, 21, 34, and 49 have been amended to contain limitations similar to those discussed

above with reference to independent claim 2. Hence, at least for the reasons given above, the

amended independent claims 15, 21, 34, and 49, and their corresponding dependent claims 16

and 18-19 (dependent on claim 15); 24-28, 30, and 32-33 (dependent on claim 21); 37-43 and

45-47 (dependent on claim 34); and 50 and 52-53 (dependent on claim 49) are also not

anticipated by Dilip. Therefore, reconsideration and allowance of claims 2, 5-9, 11, 13-16, 18-19,

21, 24-28, 30, 32-34, 37-43, 45-47, 49-50, and 52-55 is respectfully requested.

<u>New Claims</u>

The present response adds new dependent claims 56-60. Each of the added dependent

claim depends from a corresponding one of the independent claims 2, 15, 21, 34, and 49. The

added dependent claims 56-60 recite additional protectable subject matter listing various types of

media associated with media-specific communication channels. Applicants assert that no new

matter is added through the present claim additions, and that the subject matter recited in the

added claims 56-60 finds support throughout the specification of the present application.

Because each of the added claims 56-60 depends from a corresponding allowable

independent claim 2, 15, 21, 34, or 49, Applicants assert that the added dependent claims 56-60

are also allowable over Dilip at least based on their dependence on corresponding allowable

independent claims. Therefore, favorable consideration and allowance of claims 56-60 is respectfully requested.

Miscellaneous Comments

Claims 11, 13, 18-19, 30, 32, 38-43, 45-46, 52-53, and 55 have been amended primarily to provide proper claim dependence and antecedent support as can be evident from the claim amendments. As before, Applicants assert that no new subject matter is added to the specification through the present claim amendments and additions.
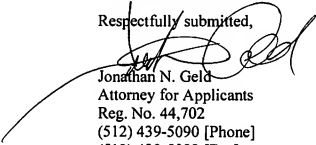
Applicants further assert that Applicants' act of responding to this Office Action should not be construed as Applicants' agreement with the Examiner's proffered reasons for rejecting the pending claims. The claims have been amended herein just to expedite the prosecution of the present application without protracted arguments and further delay. Even though the Applicants have used an alternative basis for distinguishing the currently amended set of claims from teachings in Dilip, Applicants neither agree with the Examiner's interpretation of teachings in Dilip nor do they waive their right to provide additional arguments in support of their position when necessary.

CONCLUSION

In view of the remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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